

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SAN ROCCO THERAPEUTICS, LLC,

Plaintiff,

v.

Civil Action No. 1:23-cv-10919-RGS

NICK LESCHLY, MITCHELL FINER,
PHILIP REILLY, CRAIG THOMPSON,
THIRD ROCK VENTURES, LLC,
BLUEBIRD BIO, INC., 2SEVENTY BIO,
INC.,

Defendants.

**ASSENTED-TO MOTION FOR LEAVE TO WITHDRAW
APPEARANCES FOR GOOD CAUSE SHOWN**

Lenore Horton and Shatilla Shera B. Cairns, attorneys of the law firm Horton Legal Strategies PLLC (“HLS”), and pursuant to District of Massachusetts Local Civil Rule 83.5.2(c), hereby respectfully request leave to withdraw appearances for good cause shown.

As grounds for good cause, Attorneys Horton and Cairns state as follows:

1. The attorneys at HLS, alongside the law firm of Fox Rothchild LLP, have served as counsel for Plaintiff San Rocco Therapeutics, LLC (“SRT”) since the inception of the above-entitled action.
2. The attorneys at HLS have been advised that SRT is unable to further engage with them for legal services in connection with this action.
3. Accordingly, the attorneys at HLS have been requested by SRT to discontinue their representation and, thus, have an obligation under Mass. R. Prof. C. 1.16(a)(3) to withdraw from such representation.

4. SRT will not suffer any material adverse effect on its interests because it will continue to be represented by the attorneys of record at the law firm of Fox Rothchild LLP. *See* LR 83.5.2(c)(1); *see also* Mass. R. Prof. C. 1.16(b)(1) (“[A] lawyer may withdraw from representing a client if . . . withdrawal can be accomplished without material adverse effect on the interests of the client”).
5. This action will not be delayed by the withdrawals requested herein.
6. Each party, through their respective undersigned counsel, has assented to, and does not oppose, this request for withdrawals.

WHEREFORE, Attorneys Lenore Horton and Shatilla Shera B. Cairns, respectfully request that this Court allow them leave to withdraw their appearance for good cause shown.

DATED: March 15, 2024

RESPECTFULLY SUBMITTED,

/s/ Shatilla Shera B. Cairns

Lenore Horton (*pro hac vice*)

Shatilla Shera B. Cairns (BBO #684985)

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CERTIFICATE OF COMPLIANCE

I, Shatilla Shera B. Cairns, hereby certify that I have conferred with counsel for all parties in good faith concerning the issue set forth in this document, as evidenced by the respective counsel's assent.

Dated: March 15, 2024

/s/ Shatilla Shera B. Cairns
Shatilla Shera B. Cairns

CERTIFICATE OF SERVICE

I, Shatilla Shera B. Cairns, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants on the date below.

Dated: March 15, 2024

/s/ Shatilla Shera B. Cairns
Shatilla Shera B. Cairns